

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

In re: _____ :
 Marcia Samuel _____ : Bankr. No. 16-11833-REF
 Debtor. _____ :

MOTION TO MODIFY THE CHAPTER 13 PLAN

1. The captioned debtor hereby requests that the plan be modified pursuant to 11 U.S.C. § 1329(a) so as to add arrears and attorney's fees.
2. The proposed modified plan providing for the circumstances above is attached as Exhibit A.
3. The Debtor submits that the modified plan is in the best interests of their reorganization and request this Court's approval of the same

March 16, 2020

MILLION LAW

Mark M. B.

Mark M. Billion (PA Bar No.315152)

22 New Road

Wilmington, DE 19805

el: 302.428.9400

ix: 302.450.4040

markbillion@billionlaw.com

or the Debtor